

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Anthony Duane Wilson,)	CASE NO. 4:24-cv-00062
)	
Plaintiff)	JUDGE BENITA Y. PEARSON
)	
- vs. -)	MAGISTRATE JUDGE AMANDA M.
)	KNAPP
Word Wrestling Entertainment, et al.,)	
)	DEFENDANT ALL ELITE
Defendants.)	WRESTLING'S UNOPPOSED
)	MOTION FOR EXTENSION OF
)	TIME TO RESPOND TO
)	COMPLAINT

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, Defendant All Elite Wrestling (“AEW”) respectfully moves this Court for an additional twenty-one (21) days, up to and including February 23, 2024, to answer, move, or otherwise plead in response to the Complaint of Anthony Duane Wilson (“Wilson”). AEW's response is currently due February 2, 2024.

AEW requests an extension to allow additional time to investigate the facts and circumstances surrounding the allegations set forth in the Complaint. The undersigned counsel was only recently retained to represent AEW and is still reviewing the docket and analyzing the issues related to this matter. The requested extension is not interposed for delay and will not prejudice any party. AEW has not previously sought an extension. In making this request, AEW does not waive, and instead expressly preserves, all claims or defenses available to it, including without limitation defenses pursuant to Fed. R. Civ. P. 12(b). Counsel for AEW conferred with Plaintiff Anthony Duane Wilson, and Wilson consents to this request.

For the foregoing reasons, AEW respectfully requests a twenty-one (21) day extension of time to February 23, 2024, within which to plead or move in response to the Complaint.

Respectfully submitted,

/s/ Rachael L. Rodman

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**Attorney for Defendant,
All Elite Wrestling**

CERTIFICATE OF SERVICE

I certify that on January 30, 2024, I filed the foregoing electronically. All parties will receive notice of this filing through the Court's electronic filing system and may access this filing through the Court's system. A copy of the foregoing will also be served upon Plaintiff via electronic and regular U.S. mail at:

Anthony Duane Wilson
6862 State Route 7
Kinsman, Ohio 44428

/s/ Rachael L. Rodman
Attorney for Defendant